

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE: X
X
ADVANCED SOLIDS CONTROL, LLC X CASE NO. 16-52748-RBK
X
DEBTOR X CHAPTER 11

**MOTION OF ADVANCED SOLIDS CONTROL, LLC FOR AUTHORIZATION TO
SELL REAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND
ENCUMBRANCES**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21)
DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED
HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

TO THE HONORABLE RONALD B. KING, CHIEF JUDGE,
UNITED STATES BANKRUPTCY COURT:

NOW COMES, Advanced Solids Control, LLC, Debtor-in-Possession in the above styled and numbered Chapter 11 bankruptcy case, and files this its Motion For Authorization to Sell Real Property Free and Clear of All Liens, Claims and Encumbrances, and in support thereof would respectfully show the Court the following:

1. On December 2, 2016, Advanced Solids Control, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.
2. The asset proposed to be sold is real property described as 3907 N. Pat Garrett Ct., Carlsbad, NM 88220.
3. The Debtor proposes to sell the real property for the cash sales price in the amount of \$260,000.00 to Travis and Tiffany Stevens (not related to the Debtor). The sale is scheduled to close on or before January 10, 2017.
4. The Debtor believes that the proposed sales price approximates the real property's market value in the context of such a sale, and is a reasonable value based upon the asset proposed to be sold and its marketability.
5. The real property is subject to a mortgage lien to First National Bank of Beeville in the amount of \$891,701.42. There are several other real properties which secure the claim of First National Bank of Beeville. Any outstanding ad valorem taxes, including the 2016 ad valorem taxes, will be paid in full from the sale.

6. The Debtor is requesting permission to pay all reasonable closing costs, including real estate commissions (if any), directly at closing. The net proceeds from the sale will be paid to First National Bank of Beeville against the outstanding balance of its Note (partial payment).

7. The Debtor is requesting that the sale be free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code. The lien of First National Bank of Beeville and the local ad valorem taxing authorities will automatically attach to the net sales proceeds based upon their pre-petition priority, and paid through closing.

8. Should the sale to Travis and Tiffany Stevens fail to close, the Debtor is requesting permission to sell the real property to any other third party for the minimum cash sales price in the amount of \$260,000.00.

9. A copy of the Contract is attached hereto as Exhibit "A".

10. A copy of the Order uploaded with this Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court authorize it to sell free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code the real property (3907 N. Pat Garrett Ct., Carlsbad, NM 88220) for the cash sales price in the amount of \$260,000.00 to Travis and Tiffany Stevens pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: December 12, 2016.

Respectfully submitted,



WILLIAM R. DAVIS, JR.

State Bar No. 05565500

ANGLEY & BANACK, INC.

745 E. Mulberry, Suite 900

San Antonio, TX 78212

(210) 736-6600

Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2016, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.



WILLIAM R. DAVIS, JR.

Label Matrix for local noticing

0542-5

Case 16-52748-rbk

Western District of Texas

San Antonio

Mon Dec 12 15:29:52 CST 2016

A-Terry's Plumbing Heating & AC, Inc.

P.O. Box 9714

Midland, TX 79708-9714

Advanced Solids Control, LLC

5655 Bear Lane, Suite 100

Corpus Christi, TX 78405-4407

U.S. BANKRUPTCY COURT

615 E. HOUSTON STREET, ROOM 597

SAN ANTONIO, TX 78205-2055

A. G. Adjustments, Ltd.

740 Walt Whitman Rd.

Melville, NY 11747-2212

ASK Environmental Equipment

20504 Enfield Ave. N.

Forest Lake, MN 55025-8135

AT&T Mobility

P.O. Box 6463

Carol Stream, IL 60197-6463

American Ad Valorem Tax Consultants

P.O. Box 6330

Corpus Christi, TX 78466-6330

American Medical Group Carlsbad

2410 N. Fowler

Hobbs, NM 88240-2312

Atmos Energy

P.O. Box 790311

St. Louis, MO 63179-0311

Ber Mar Rewind, Ltd.

9609 109 Street Grand Prairie

AB T8V 4E3 Canada

Big Dog - Rig Movers

7500 W. Hwy. 80

Midland, TX 79706-2856

Cain Electrical Supply

P.O. Box 16489

Fort Worth, TX 76162-0489

Carlsbad Irrigation District

5117 Grandi Road

Carlsbad, NM 88220-8931

Chamberlain Enterprises, LLC

205 Raymond St.

Carlsbad, NM 88220-9696

City of Carlsbad

P.O. Box 1569

Carlsbad, NM 88221-1569

City of Midland

P.O. Box 1152

Midland, TX 79702-1152

Crain, Caton & James

17th Fl., 1401 McKinney St.

Houston, TX 77010-4035

DNOW, LP

P.O. Box 40985

Houston, TX 77240-0985

Darin Merle Harding

5655 Bear Lane, #100

Corpus Christi, TX 78405-4407

DirectV

P.O. Box 105249

Atlanta, GA 30348-5249

Eddy County Treasurer

101 W. Greene, Suite 117

Carlsbad, NM 88220-6258

First Insurance Funding Corp.

P.O. Box 66468

Chicago, IL 60666-0468

First National Bank of Beeville

1400 E. Houston St.

Beeville, TX 78102-5380

Fluid Audience, Inc.

102-10001-101 Avenue Grande Prairie

AB T8V 0X9 Canada

Forrest Tire, Inc.

P.O. Box 1778

Carlsbad, NM 88221-1778

Frost Bank

c/o Robert L. Barrows

Warren, Drugan & Barrows, P.C.

800 Broadway

San Antonio, TX 78215-1517

Frost National Bank

100 W. Houston Street

San Antonio, TX 78205-1400

Gabriel Jaime

3509 Hickory Tree Rd.

Bach Springs, TX 75180-2205

Gary Sweetman

226 Augusta Drive

Portland, TX 78374-4001

Harvey Fuels, Inc.
P.O. Box 8026
Ruidoso, NM 88355-8026

Industrial Electric Motors, Inc.
P.O. Box 926
Carlsbad, NM 88221-0926

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Kirby-Smith Machinery, Inc.
P.O. Box 270360
Oklahoma City, OK 73137-0360

Komatsu Southwest
P.O. Box 842326
Dallas, TX 75284-2326

LG Pest Control, LLC
2612 Mountain View
Carlsbad, NM 88220-3260

Layer One Networks, LLC
5705 Goliad Rd., #1
Corpus Christi, TX 78412-3109

Leaf Capital Funding, LLC
P.O. Box 742647
Cincinnati, OH 45274-2647

Linebarger Goggan Blair & Sampson
David G. Aelvoet
711 Navarro, Suite 300
San Antonio, TX 78205-1749

Magnum Oil Tools International, Ltd.
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405-4407

Midland Central Appraisal District
4631 Andrews Hwy.
P.O. Box 908002
Midland, TX 79708-0002

Mike Valdez
P.O. Box 344
Loving, NM 88256-0344

Mobile Safety and Consultation, LLC
P.O. Box 1813
Carlsbad, NM 88221-1813

Munsch Hardt Kopf & Harr, PC
500 N. Akard St.
Dallas, TX 75201-3302

National Truck Services Group
2300 N. Main Suite 7
Clovis, NM 88101-3575

Nichols Printing, Inc.
P.O. Box 608
212 West Lea St.
Carlsbad, NM 88220-5669

North Texas Tollway Authority
P.O. Box 660244
Dallas, TX 75266-0244

Nueces County
c/o Diane W. Sanders
Linebarger Goggan Blair & Sampson, LLP
P.O. Box 17428
Austin, TX 78760-7428

Nueces County Tax Collector
Kevin Kieschink
P.O. Box 2810
Corpus Christi, Texas 78403-2810

Otis Mutual Domestic Water
P.O. Box 5069
Carlsbad, NM 88221-5069

Pactec, Inc.
P.O. Box 8069
Clinton, LA 70722-1069

Prince Parker & Associates, Inc.
P.O. Box 474690
Charlotte, NC 28247-4690

Professional Communications
P.O. Box 61830
Midland, TX 79711-1830

RK Pump & Supply
11400 West County Rd. 30
Midland, TX 79707-7501

Reliant
P.O. Box 650475
Dallas, TX 75265-0475

SLS Litigation Services, LLC
4008 Louetta Rd., Suite 233
Spring, TX 77388-4405

Sentrimax Centrifuges, Inc.
108 Sentry Drive
Mansfield, TX 76063-3608

Stang Automation, Inc.
100 Pointe Marcelle Beaumont
Alberta T4X 0G2 Canada

Systemseven Services
8240 N. MoPac Expwy, #350
Austin, TX 78759-8894

TKH Services
P.O. Box 3053
Carlsbad, NM 88221-3053

Teletrac Corporation
7391 Lincoln Way
Garden Grove, CA 92841-1428

Texas Mutual Insurance Co.
P.O. Box 841843
Dallas, TX 75284-1834

The Water Works
313 South Canal
Carlsbad, NM 88220-5656

Tranbarger & Company, LLP
802 N. Carancahua, Suite 1660
Corpus Christi, TX 78401-0030

Tucker, Albin & Associates, Inc.
1702 N. Collins Blvd., Suite 100
Richardson, TX 75080-3662

United Fire Group
P.O. Box 3244
Cedar Rapids, IA 52406-3244

United Healthcare
Dept. CH 1051
Palatine, IL 60055-0151

United States Attorney
Taxpayer Division
601 N.W. Loop 410 Suite 600
San Antonio, TX 78216-5512

United States Attorney General
950 Pennsylvania Ave., NW
Washington, DC 20530-0001

United States Trustee - SA12
US Trustee's Office
615 E Houston, Suite 533
PO Box 1539
San Antonio, TX 78295-1539

UnitedHealthcare
Attn: CDM - Bankruptcy
185 Asylum Street - 03B
Hartford, CT 06103-3408

Warren Lynn Frazier
713 Snug Harbor
Corpus Christi, TX 78402-1700

Web Listings, Inc.
1623 Military Rd., #926
Niagara Falls, NY 14304-1745

Williams Scotsman, Inc.
P.O. Box 91975
Chicago, IL 60693-1975

Windstream
P.O. Box 9001908
Louisville, KY 40290-1908

Xcel Energy
P.O. Box 9477
Minneapolis, MN 55484-9477

XXXX
111 E. 17th Street
Austin, TX 78774-0210

XXXX
P.O. Box 25128
Santa Fe, NM 87504-5128

William R. Davis Jr
Langley & Banack, Inc
745 E Mulberry Ave, Suite 900
San Antonio, TX 78212-3141

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(u) State of New Mexico

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